

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

TQ DELTA, LLC,

Plaintiff,

v.

**COMMSCOPE HOLDING COMPANY, INC.,
COMMSCOPE INC., ARRIS
INTERNATIONAL LIMITED, ARRIS
GLOBAL LTD., ARRIS US HOLDINGS, INC.,
ARRIS SOLUTIONS, INC., ARRIS
TECHNOLOGY, INC., and ARRIS
ENTERPRISES, LLC,**

Defendants.

CIV. A. NO. 2:21-CV-310-JRG
(Lead Case)

TQ DELTA, LLC,

Plaintiff,

v.

**NOKIA CORP., NOKIA SOLUTIONS AND
NETWORKS OY, and NOKIA OF AMERICA
CORP.,**

Defendants.

CIV. A. NO. 2:21-CV-309-JRG
(Member Case)

NOKIA OF AMERICA CORP.,

Third-Party Plaintiff,

v.

**BROADCOM CORP., BROADCOM INC., and
AVAGO TECHNOLOGIES
INTERNATIONAL SALES PTE. LTD.,**

*Third-Party
Defendants.*

**DECLARATION OF DARLENA H. SUBASHI, ESQ., IN SUPPORT OF
NOKIA'S SUR-REPLY IN OPPOSITION TO TQ DELTA'S MOTION FOR LEAVE TO
AMEND ITS INFRINGEMENT CONTENTIONS [DKT. NO. 86]**

I, Darlena H. Subashi, hereby declare under penalty of perjury that:

1. I am an attorney at the law firm of Alston & Bird LLP, counsel for Defendants Nokia of America Corporation, Nokia Solutions and Networks Oy, and Nokia Corporation (“Nokia”). I am a member in good standing of the Bars of Massachusetts, North Carolina, and New York and am admitted to practice before this Court. I am filing this declaration in support of NOKIA’S SUR-REPLY IN OPPOSITION TO TQ DELTA’S MOTION FOR LEAVE TO AMEND ITS INFRINGEMENT CONTENTIONS [DKT. NO. 86]. Except where otherwise indicated, I have personal knowledge of the facts stated herein and, if called as a witness, I could and would testify thereto.

2. Attached as Exhibit 1 is a true and correct copy of email correspondence between K. Wroblewski and B. Davis, dated Dec. 8, 2021 (“2021.12.08 Email Correspondence from K. Wroblewski to B. Davis”). Highlighting has been added for the convenience of the Court.

I declare under penalty of perjury that the foregoing is true and correct.

Date: March 21, 2022

/s/ Darlena H. Subashi
Darlena H. Subashi